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ABSTRACT

Several problems result from irresponsible claims of accreditation by non-traditional schools of education and the laxity with which some states license teachers. A model that features accreditation, licensing, and performance evaluation could create a triangle of checks and balances that would help to solve many of these problems. A national perspective on professional accreditation is a means to avoid a parochial view of what teacher education programs should be like. Teams composed of out-of-state evaluators who possess diverse professional backgrounds have a stimulating effect in promoting exchanges of ideas and applications of the best professional knowledge in state agencies. National accreditation programs, however, cannot conduct assessments of individual competencies as state agencies can. State education agencies should play a key role in encouraging institutions to develop and modify programs to meet state and community needs. Cooperation between national and state agencies can provide an accurate picture of the quality of programs and program graduates. Local education agencies have a responsibility to screen applicants for employment fairly and accurately. This system of checks and balances can assure employment of teachers who have been screened through their graduating from a professionally-accredited program, their successful negotiation of an individual state licensing examination, and their employment after a careful screening by a local district. (JD)

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A TRIANGULAR MODEL
FOR ASSESSING AND ASSURING PROFESSIONAL COMPETENCE

Lyn Gubser
Director, NCATE

Remarks before the 32nd Annual Texas Conference on Teacher Education
Austin, Texas
October 28, 1979

Developments in national accreditation in teacher education have been intense within the past five years. The National Council for Accreditation of Teacher Education (NCATE) has now become the largest specialized accrediting agency in the United States, both in terms of the number of four-year institutions visited and professional programs reviewed. NCATE has also established what is, as far as we know, the highest rate of accreditation selectivity. Within a few short years, the number of institutions denied accreditation of one or more programs has increased from fewer than 10% in 1973, to 34% of those reviewed in 1978-79. Since January 1st of this year, NCATE has acquired a virtually new staff, new Washington offices, implemented new standards, developed new accrediting procedures, instituted a micrographic system for storing invaluable archives, implemented a management by objectives system, published a compilation of evidence questions to provide specificity to NCATE Standards, implemented a new system for training evaluation team members, changed its accounting firm, its bank, its logo, and is even contemplating a change of name.

But clearly the most dramatic change has come with NCATE's recognition as a standard-bearer in consumer protection. The National Council has officially pledged

> ...to defend the rights, responsibilities, and interests of the general public, of students, and of all parties having an interest in programs for the preparation of personnel for our nation's schools.[1]

This year two public members were added to the Council of 28, joining representatives of the 14 constituent and associate Council members that represent higher education,

[1] Testimony by Dr. Gubser before the U.S. Office of Education Commissioner's Advisory Committee on Institutional Eligibility and Agency Evaluation, June 20, 1979 (USOE DEAE).

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classroom teachers, chief state school officers, school psychologists, school administrators, state teacher certification officers, teacher educators, school boards, students, audiovisual specialists, counselors, and an array of subject area specialists. In a sense, each of these groups stands for the improvement of education of children and youth, and thereby directly serves the public interest, for the instruction of our citizenry is a predominant concern of the American people. Preparation of those who will teach our children, as well as those who are to counsel them and organize their instruction, is pre-eminently in the public's interest.

Consumer protection represents a specific facet of NCATE's public interest commitment. At its October, 1979, meeting in Louisville, the Council determined that henceforth a student representative shall serve on each regular visiting team. The efforts of the Student National Education Association in stressing the interests of teacher education students, as well as their devotion to excellence in training for service on NCATE teams were compelling factors in the Council's decision. We might note that during this past year, NCATE received more praise for the work of student members of evaluation teams than for any other single constituent group. Students of both basic and advanced teacher education programs have come into their own as partners in the accreditation process. They have also worked to insure that NCATE's standards on evaluation clearly promote the use of student feedback in curricular revision and institutional planning. Evaluation of graduates has become one of those program activities most closely attended to by the Council in its assessments of programs.

IN THE NATIONAL INTEREST

Aside from student involvement, two other factors have drawn NCATE into the battle for consumer protection. The first relates to the phenomenon of bogus institutions, the second to the federal government's increased use of specialized

accreditation as a criterion in establishing institutional eligibility for federal funds.

Since becoming director of NCATE on July 1, 1978, I have been both surprised and dismayed by the frequency of complaints we receive from students, teachers, administrators, counselors, school districts and other governmental agencies who have been victimized by so-called "universities" offering mail-order diplomas and spurious degrees. We have received complaints from students whose tuition money has been taken by some back alley operation and for whom little, if any, training has been provided. For example, two New York women reported spending over $5,000 for doctoral programs in special education from a so-called "nontraditional" institution in Kansas City. Since their school district would not provide them professional advancement credit unless their degrees were from an NCATE-accredited institution, they wrote to us to determine when we were going to finalize accreditation of this institution, which had advertised itself as being an "applicant" for NCATE accreditation. Of course, they were not, nor do we even recognize "applicant" status as is common of many institutional accrediting agencies. The institution, however, had moved its office, and we could not even provide an address to which these unfortunate teachers could write for a return of their investment. One can accuse these teachers of being afflicted with terminal gullibility, but let me assure you that the promotional materials of many of these institutions is sufficiently slick and promising that the reader *wants* to believe even the most obviously misleading claims.

Even governmental agencies can be victimized. Some time ago we received a call from an officer of the Bureau of Education for the Handicapped, inquiring about the accreditation status of an institution calling itself the University of Central Arizona. Having spent seven of the last ten years in Tucson, and never having heard of that institution, I questioned that it even existed. We learned that two employees of the BEH had allegedly returned from their winter vacations with doctorates from this

establishment and were pushing the U.S. Office of Education for increases in their GS ratings as a result of their having completed terminal degrees. We were told by officials of the Arizona Board of Regents that this institution had been closed. And when the American Association of School Administrators, one of our constituent organizations, printed that information in one of their publications, the University of Central Arizona threatened to sue AASA and NCATE, for they were still in operation, and litigation to close them down under Arizona's consumer fraud act was still pending.

The University of Central Arizona was founded by the same junior college teacher who established Laurence University in California and, before that, Laurence University in Florida. When the state of Florida refused to grant a permanent license to allow Laurence University to continue to operate in Florida, it was purchased by a new group calling itself the University of Sarasota. The University of Sarasota was the non-traditional institution that gave doctorates to Philadelphia School Superintendent Michael P. Marcase and other Philadelphia school district personnel, including two district superintendents, several department heads, principals, psychologists, and other officials for "...as little as four weeks of classwork, spread over a summer or two."[2] *The Philadelphia Bulletin* quoted Philadelphia school district's supervisor of vocational training and job placement (of all people!) as saying that his doctoral program "...wasn't a vacation," although "I was in the pool at 5:00 p.m. daily. But from 8:00 a.m. to 4:30 p.m.," this supervisor continued, "I was in school. And even around the pool we talked business."[3]

While some might be amused by such academic irresponsibility, the Pennsylvania Department of Education did not find any humor in the situation. Reports the *Bulletin*:

When /Philadelphia Superintendent of Schools Michael/ Marcase was named to his

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[2] *The Philadelphia Bulletin*, Philadelphia, Pennsylvania, September 24, 1978, page A-4.

[3] *Ibid.*

> $50,000-a-year job, State Education Department officials sais his Laurence University credits and Sarasota degree would not count toward qualifying him for the job. Then the Pennsylvania Legislature...passed a law giving Marcase 12 credits for his experience, letting him keep his job.[4]

The state education department was embarrassed. The public was ripped off.

Particularly popular among the offerings of transient institutions have been those programs that provide doctorates to school administrators. Institutions frequently argue that by virtue of their position, administrators have clearly acquired sufficient "life experiences," making superfluous a normal residency program at an accredited institution. But in actuality, many administrators have not had such life experiences. In some instances they may have had little, if any, training for administrative service. Some states, for example, have no specific educational requirements for superintendents. Local educational agencies are free to set their own. In these states a superintendency may be a more political than professional appointment. It cannot be assumed that one obtaining a superintendency in such a state would have any special professional experience that would justify a shortcut to a professional degree.

Teachers, too, may not have had any life experiences that a reasonable citizen would consider appropriate to a college degree, yet if the price is right, some institution will provide the credentials. One Florida institution charges $20 per life experience credit included in a total of $3,085 for a bachelor's degree that can be completed in four months, and advertises programs in education, pre-law, pre-med, and engineering.

Large fees are typical of these schools, because a degree can be provided without the recipients taking leave from their employment, and the traffic will therefore bear

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[4] *The Philadelphia Bulletin, Ibid.*

heavy fees. Individuals finding themselves in high-salaried positions, without benefit of appropriate credentials, rationalize themselves into defending the indefensible, locking into programs offering degrees requiring little, if any, commitment or individual effort. The dissertation requirements for doctoral programs at some institutions, charges an investigator of the Arizona attorney general's office, are less stringent than most high school book reports.

The growth in the number of bogus instutions operating in this country has been dramatic and so, too, have been the profits they are making. Such schools usually have exceptionally high administrative overhead, often supporting boards of directors that frequently list the names of well-known persons from government and higher education. Frequently, the same individuals serve on the boards of directors of more than one such institution. Individuals and groups often seem interrelated, serving on each other's boards, teaching on one another's faculties, and even accrediting one another. A telephone call to a Colorado institution is answered by a secretary sitting in an office in Boca Raton, Florida. The president of one institution in one state turns out to be executive vice president of an institution in another. And the money piles up, with salaries of top officials of some institutions even running into six figures. The profits of the few, however, are minute compared to the loss of the many. The erosion of public confidence in the educational profession, as well as the destruction of academic credibility, is nearly fathomless as such debasement dredges up the anti-intellectual sentiments that perpetually lie shallow below the surface of American public opinion.

The rejoinder of proponents of some of these institutions has been that traditional accrediting agencies simply do not understand the nature of non-traditional programs and are bent upon killing creativity and strangling experimentation in higher education. This is strictly unture. NCATE, for example, has developed standards that apply to non-traditional programs and specifically encourages experiment-

ation in professional education. The Council does, however, expect non-traditional programs to demonstrate clear and precise program design, to show that standards are maintained for student admission and quality of faculty, and to document that the products of non-traditional programs are carefully evaluated. Many on-going, highly experimental programs have been accredited by the Council, yet they differ substantially from their irregular counterparts in that they adhere to strict professional standards and are routinely evaluated by independent persons and agencies.

Having been denied accreditation even by regional accrediting associations, a group of so-called "non-traditional" schools last year joined together to form an association calling itself the National Association of Private Non-Traditional Schools and Colleges (NAPNSAC) in an effort to be recognized by the U.S. Office of Education as an accrediting agency. Their obvious objective was to enable those institutions they represented to become eligible to receive federal funds, including student loan monies, from over 24 pieces of federal legislation that now require specialized accreditation of grant recipients. NCATE was the only party to testify against recognition of this group as an accrediting agency. We believe that to make eligible for public support from taxpaying Americans the institutions represented by such a self-serving association would be a travesty against every accredited college and university in the nation--and we said so. Our testimony contributed to a unanimous decision to deny federal recognition to NAPNSAC, but the threats we received from their stable of attorneys gave us pause, as did the issue of their challenge that they would return.

In seeking to protect the public interest, the National Council has assumed and been assigned by both the Council on Postsecondary Accreditation and the U.S. Office of Education the role of adjudging the quality of programs that prepare American teachers and school support personnel. NCATE accreditation now certifies to the public that programs have been evaluated and found to meet minimum standards of quality and are appropriate for the preparation of professionals and deserving of public trust and

support. NCATE's public interest stance was recently lauded by the U.S. Office of Education in a June, 1979, decision to grant NCATE continued recognition as the specialized accrediting agency responsible for determining eligibility for federal funding under those acts requiring specialized accreditation for institutional eligibility for funding. NCATE has taken the stand that in determining the appropriate distribution of public funds to institutions for the improvement of public instruction, governmental agencies should provide funds only to institutions that have demonstrated public accountability. As Congress works to draft a new Education Act for the new Department of Education, we have been assured that this conviction will be incorporated into the law.

IN THE STATE INTEREST

NCATE's involvement in the protection of the public interest at the national level has been equaled if not surpassed by its activities among the states. The U.S. Office of Education now cites 26 states that require NCATE accreditation for various purposes of teacher certification or licensing of school support personnel. We are also observing an increase in the number of states that have adopted NCATE Standards as standards for state program assessment. This has occurred under board of education policy in such states as Arkansas. Wisconsin is now writing NCATE Standards into their state education code for programs for the preparation of school psychologists. Since NCATE only evaluates programs that have state approval, compatibility of state assessment criteria and NCATE Standards becomes important for institutions as well as the Council.

The current issue regarding the testing of teachers has thrust NCATE into a new arena of public responsibility at the state level. Widely reported low performance of teachers on various test measures has further eroded confidence in professional educators. The Council and its various constituents have been especially concerned about the testing issue, since our principal reason for being is to improve

the quality of personnel in American schools.

Contrary to reports in the popular press, neither the NEA, nor any of the other members of the Council, are opposed to the examination of those who seek entrance into American classrooms. Our constituents are opposed to tests that have obvious cultural biases. They are opposed to using a single test as the sole criterion for determining who shall be credentialed. They believe that some form of carefully-supervised and evaluated internship should be included in the over-all examination of the teaching skills of an individual, and they contend that the united profession--including teacher educators, classroom teachers, administrators, parents, and students--should be involved in assessing the professional worth of prospective educators. Evaluation continues to be one of the hallmarks of NCATE accreditation. Unlike nearly all other accrediting agencies, NCATE stresses the systematic evaluation of graduates of accredited programs and the importance of feeding evaluation results back into program modification and long-range planning.

In coming to grips with those issues prompted by its regulatory function and public interest role, NCATE has had to adjust and improve its procedures and practices. With 17% of those institutions reviewed by the Council being denied accreditation of all programs, and another 17% denied accreditation of one or more programs, due process has had to be provided meticulously to institutions and NCATE Standards have had to be defined more specifically. The latter have now been supplemented by a publication of evidence questions intended by the NCATE Standards Committee to delineate the meaning and expectation of each criterion.

In the area of evaluation of graduates, however, NCATE has experienced difficulty. It is not that institutions do not wish to evaluate their graduates, for the record clearly demonstrates the frequency and mixed success of their attempts. But in seeking to assess the competencies of those they have prepared, colleges and universities have encountered obstacles to what would otherwise seem a simple task. Locating graduates has proved to be nearly impossible for many schools. Once a person has

graduated from an institution, that school literally has no control over that individual. It is not uncommon for universities, after expensive searches of alumni files and repeated requests for responses from located graduates, to show less than a 40% return of survey forms and inquiries. It must be remembered that the graduates of many institutions will teach not only outside the geographic area of the school, but frequently outside the state and even region in which they completed their preparation.

Those institutions, such as Western Kentucky University, that have had some success in acquiring responses from graduates have been able to do so because they have maintained a sustained contact with graduates, rather than trying to re-establish contact some years after graduation. But such sustained contact costs money, and when institutions have been forced to the wall financially, evaluation of graduates has been one of the first projects to go.

Even if logistical and ... al problems can be solved, institutions frequently lack the research capability to develop an appropriate evaluation program. Therefore, the type of assessment that most institutions undertake is usually of the "survey" nature, which has proved less than helpful or statistically defensible. Sampling problems develop that usually overwhelm any usable data.

While the rate of return of questionnaires from employers is greater than that from graduates, the information supplied has not been particularly helpful. Fearful of litigation, rarely will individuals now respond negatively regarding the competencies of those in their employ. With increasing frequency, institutions are now reporting legal barriers to the acquisition of information about the performance of program graduates from employers of their former students. In some states universities have been prohibited from assessing graduates under terms of collectively bargained contracts.

Two conclusions can be drawn: surveys and mail questionnaires do not produce the data necessary for adequate evaluation of program graduates; and, for a variety of

reasons, institutions of higher education are experiencing great difficulty in maintaining systematic and sustained evaluation efforts.

Insuring that those who enter our schools are appropriately skilled is officially the responsibility of state departments of education. In issuing a license to an individual, a state acknowledges that the individual has been given certain authority to practice the act of teaching, or administration, or counselling, within the borders of that state. Throughout most of this century, the licensing process for educators went hand-in-hand with the completion of two or four years of higher education, usually including some coursework in methodology, and frequently prescribing some study relating to state citizenship.

With the expansion of the knowledge base and increased social responsibilities placed upon the schools, licensing requirements now may require work in special education, reading, measurement, multicultural education, and decidedly more field experience. Few states will now certify anyone who has not completed a four-year program, and many require a fifth-year of graduate-level preparation, including some period of internship, as prerequisite to permanent certification. Concern for the preparation of teachers has resulted in the establishment among many states of professional practices commissions. In discharging their responsibilities to assess the quality of educational personnel, most of these commissions have taken the "approved program" approach. In doing so, they follow the historic path of placing responsibility for the evaluation of prospective teachers back upon the institution. By graduating students from an approved program, the institution coincidentally implies that each individual completing that program is worthy of being licensed by the state to enter a professional role.

To be crass about it, the approved program method is basically a cheap way to license teachers. Much as medieval popes baptized entire villages, so too are teacher education program graduates licensed *en masse* through the state approval process. To accomplish program approval in those states that have it, states have adopted standards not unlike those developed by NCATE. In fact, as in the case of Texas, some of those

responsible for developing state standards have actually served on the National Council and even its Standards Committee. The high correlation between state and national standards has hardly been coincidental.

The program approval process has in most states proved less than satisfactory. A recent study of state program approval commissioned by the California Commission for Teacher Preparation and Licensing, conducted by Michael Scriven of the University of San Francisco--who happens to be this year's president of the American Educational Research Association, placed problems of state assessment into three categories: accuracy, ethics, and cost.

With respect to accuracy, Scriven notes that:

> ...virtually all state certification systems /are/ extremely favorable to the programs under review, in the sense that even if criticisms are raised and officially sanctioned as "considerations," they are *always* removed before *any* actual suspension of the right to credential occurs. Now it *might* be the case that this reflects a high level of performance by the programs, but that there should *never* be a failure stretches credibility. (Emphasis Scriven's.) 5

In his survey, Scriven did not cite any program that was ultimately denied approval. I recognize that some institutions do not submit for state approval programs they know will not meet state requirements. But in actually denying approval to existing programs, states have not been successful. Perhaps we are expecting state agencies to play a role for which they have not the financial or personnel resources to play. Says Scriven:

> ...when we consider the alternative explanation, that political pressure makes it impossible for a political commission made up largely of representatives of the very institutions that are accredited to actually take punitive action, we must obviously be cautious about assuming the worst. 6

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5 Michael Scriven, Director, Evaluation Institute, University of San Francisco. "Recommendations for Modification in External Assessment Process." State of California: Commission on Teacher Preparation and Licensing. August 9, 1979.

6 *Ibid.*

But it is not difficult to draw such conclusions when one is faced with evidence that personal and political considerations outweigh professional judgment in assessments. I personally observed the state assessment of a counselor education program in which all six members of the state team were graduates of the program they were evaluating. Self-serving assessments are not atypical in some states, where financial exigencies prohibit employing evaluators from outside the regions of particular institutions.

In the final analysis, Scriven finds that:

> ...there are a very few cases where an indictment is made that cannot possibly be reconciled with continuance of the (de facto) right to credential. It is hard to avoid concluding a fraud on the public to say there are 20 serious problems with a program, but it should continue to award credentials while it works to remove these conditions. What kind of credential is it awarding? One which lacks a dozen or a score of required features, *i.e.*, one which should not be allowed.7

Is all this to suggest that politics and economics will dominate, and we cannot find a way in which effective program evaluation can be accomplished or that states can insure that those licensed to teach have the prerequisite skills to accomplish their instructional tasks? I think not. I believe that the answers to these vexing questions are at hand. Let me describe for you a model of accreditation, licensing, and performance evaluation that could create a triangle of checks and balances that would help to solve many of the problems faced in licensing our profession--and hopefully would restore public faith in the quality of professional education.

A TRIANGLE OF CHECKS AND BALANCES

In describing the first leg of this proposed triangle, let us consider the benefits and limitations of national accreditation and what it might be able to accomplish that others cannot. Being a national, nongovernmental accrediting agency, NCATE has been successful in making accreditation denials stick. Our

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7 *Ibid.*, pages 2-3.

belief is that we can give assistance to states in "taking the heat" for decisive actions in curtailing ineffective and ineffecient preparation programs. This is not to say that we do not receive criticism from some sources when program denials occur. Frequently we do. But NCATE has demonstrated that it can stand the pressure of withdrawing recognition of programs that cannot be professionally defended. The Council is now too large and its constituencies too varied to succumb to pressures from an institution or other particular source.

Professional accreditation can also bring a national perspective to what would otherwise constitute a parochial view of what preparation programs should be like. In addition to absolving states of charges of conflicts of interest, teams strictly composed of evaluators from out-of-state who possess diverse professional backgrounds have a decided stimulating effect in promoting exchanges of ideas and applications of the best professional knowledge.

Where national accreditation can work to protect professional decisions, it cannot be expected to conduct the assessments of individual competencies that state agencies can. Nor can national accreditation determine the need for particular programs in individual states, nor decide the appropriate location of such programs as can the states.

The second side of our triangle therefore relates to state licensing activities and particularly to the evaluation of the instructional and educational skills of individual applicants for state certification. State educational agencies should play a key role in encouraging institutions to develop and modify programs to meet state and local community needs. State agancies could produce information on the performance of graduates of institutions, including students from institutions extraneous to their individual states, that would provide NCATE with invaluable data for determining if graduates of accredited institutions are performing at levels intended, needed, or claimed. And NCATE could route these data back to institutions which, many for the first time, would gain an accurate picture of the products of their programs.

It is coming to be an accepted view that state licensing of teachers should be accomplished on an individual basis, as occurs in other professions. But in addition to pencil and paper examinations covering both general and specific areas of knowledge, candidates should demonstrate their instructional and other professional competence through some period of supervised internship. Although monitored by the state, examinations for state licenses should be administered by classroom teachers, subject area specialists, and those holding particular expertise in the area of instructional or other competence claimed by the applicant. Once examination data are added to information acquired through direct observation, a jury of practitioners would then have sufficient information upon which to base a decision on whether to grant a professional license. In both South Carolina and Georgia such assessment systems are under development and should be underway within the next two years.

Detractors of individual assessment have been quick to note the obvious expense of such a system. Teaching licenses in most states cost approximately $15. Licenses in other areas, such as for physical therapists or beauticians, cost well over $300. Is it not time that prospective teachers paid a fee more nearly commensurate with the magnitude of the authority they are requesting? The public interest in qualified school personnel is such that much of the cost of professional examinations should obviously be tax-supported. Professional associations likewise have a stake in professional competence and could as well contribute fiscal support. Indeed, the cost to the profession of continued erosion of public confidence may far exceed what the cost of a professional licensing system would have been.

The third element of our triangle is one that has been by far the most neglected. This area of responsibility relates to local educational agencies who actually have the most direct authority and public charge to employ only the most competent educational personnel. This task cannot be accomplished without the support of the organized

profession.

For years, we have demanded that teachers "police their own ranks," but when they have attempted to do so, they have been regularly rebuffed. In some rare instances--Allentown, Pennsylvania, comes to mind--teachers are now being permitted to select two or three candidates for each vacant teaching position from which district administrators ultimately select and hire a teacher. Local teacher associations increasingly are insisting that those brought into their ranks have been graduated from programs that have been provided the stamp of approval by the national profession, and that they have completed licensing examinations in which educators have had an opportunity to assess the skill levels of those who would join the profession. In local districts the profession is beginning to demand a say in who is employed by their school districts as they come to recognize that it is the united profession that the public and especially the media will ultimately hold accountable for the quality of instruction within district schools.

The complex variables in this triad are shaping up to make possible the employment of persons who have been screened through their graduating from a professionally-accredited program, their successful negotiation of an individual state licensing examination and supervised internship, and--ultimately--their employment after careful screening by a local district. This system of checks and balances clearly could insure that those employed to instruct our children have the prerequisite skills and measured abilities to do so. In the public interest I submit this design for your comment and consideration.

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